

BEFORE THE IOWA DEPARTMENT OF INSPECTIONS AND APPEALS

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IN THE MATTER OF	)	NO. 18DPH0012
	)	
CHRISTINA BROWN	)	
3412 Davis Street	)	
Sioux City, Iowa 51105,	)	<b>CONSENT AGREEMENT</b>
	)	
Appellant,	)	
	)	
v.	)	
	)	
Iowa Department of Public Health,	)	
	)	
Respondent.	)	
	)	

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COMES NOW the Iowa Department of Public Health ("Department") and Christina Brown ("Appellant"), and pursuant to Iowa Code section 17A.10 and 641 Iowa Administrative Code 131.12 enter into the following settlement of this matter:

1. On February 22, 2018, the Department issued a Notice of Proposed Action: Suspension/Probation, directed to Appellant. The Notice of Proposed Action was amended pursuant to motion of the Department and Order of the Administrative Law Judge on June 11, 2018. The Notice of Proposed Action: Suspension/Probation, as amended, shall be referenced in this Agreement as the Notice.

2. On March 21, 2018, Appellant requested a hearing regarding the proposed suspension/probation.

3. The case is currently scheduled for hearing June 18, 2018.

4. Appellant hereby withdraws her request for appeal in the above-captioned matter. Execution of this Consent Agreement by all parties constitutes the resolution of this contested case. Appellant waives the right to hearing and all attendant rights, including the right to appeal, by freely and voluntarily agreeing to this Consent Agreement.

5. This Consent Agreement is subject to approval of the Department. If the Department approves this Agreement, it becomes the final disposition of this matter. If the Department fails to approve this Agreement, it shall be of no force or effect to either party.

6. This Consent Agreement shall be part of the permanent record of Appellant and shall be considered by the Department in determining the nature and severity of any disciplinary action to be imposed in the event of any future violations.

7. This Consent Agreement and the Notice are public records available for inspection and copying in accordance with the requirements of Iowa Code chapters 22 and 272C.

8. The Department's approval of this Consent Agreement shall constitute a FINAL ORDER of the Department and constitutes final agency action in this matter.

IT IS THEREFORE ORDERED:

9. Appellant's certification # PM-05-1604-08 shall be placed on PROBATION for a period of eighteen (18) months from the date of execution of this Agreement, subject to the following terms and conditions:

i. Within thirty (30) days of the execution of this Agreement, Appellant shall complete the following three requirements and provide proof of successful completion of each requirement to the Department. In the event Appellant fails to complete each of these requirements within the thirty (30) day period, Appellant's certification shall be indefinitely suspended until such terms have been completed and the Department has approved reinstatement of Appellant's certification.

(1) Appellant shall successfully complete a paramedic refresher course at an Iowa authorized EMS training Program or through a Department-approved online provider. This course shall be in addition to those required for renewal of Appellant's certification.

(2) Appellant shall successfully complete the National Registry cognitive exam for paramedics. This course shall be in addition to those required for renewal of Appellant's certification.

(3) Appellant shall successfully complete the National Registry practical exam for paramedics. This course shall be in addition to those required for renewal of Appellant's certification.

ii. Appellant shall comply with the terms and conditions of probation contained in the Notice at “a” – “h” during the duration of the probationary period.

10. Appellant is responsible for all costs associated with compliance with this Agreement.


11. All other language, terms, and conditions in the Notice remain intact and in full force and effect.

12. In the event Appellant violates or fail to comply with any of the terms of this Consent Agreement, the Department may initiate appropriate action to revoke or suspend Appellant's certification or to impose other appropriate discipline.

AGREED AND ACCEPTED:



Christina Brown  
APPELLANT



Rebecca Curtiss  
CHIEF, BUREAU OF EMERGENCY  
AND TRAUMA SERVICES  
IOWA DEPARTMENT OF PUBLIC  
HEALTH

Dated this 18<sup>th</sup> day of  
June, 2018.

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June, 2018.

Copies mailed to:

Iowa Department of Inspections and Appeals  
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Division of Administrative Hearings  
Wallace State Office Building  
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